

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

PAUL STERLING on behalf of himself,	§	
Individually, and ALL OTHERS	§	
SIMILARLY SITUATED	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 4:20-cv-00910
	§	
GREATER HOUSTON TRANSPORTATION,	§	
COMPANY, TEXAS PARATRANSIT, INC.,	§	
YELLOW CAB PARATRANSIT	§	
SERVICES, INC and	§	
METROPOLITAN TRANSIT AUTHORITY	§	
OF HARRIS COUNTY,	§	JURY TRIAL DEMANDED

**SUGGESTION OF BANKRUPTCY**

Defendant Greater Houston Transportation Company filed for protection under Chapter 11 of the United States Bankruptcy Code on July 19, 2021, under Bankruptcy Case No. 21-60066, styled *Greater Houston Transportation Company*, Debtor, in the United States Bankruptcy Court for the Southern District of Texas, Houston Division. The filing of this Suggestion of Bankruptcy is appropriate and necessary in this matter even if this is a matter in which Defendant is not currently a defendant (was never named a defendant, or subsequently removed as a defendant, or is removed as a defendant in the future) due to Defendant's contractual indemnification coverage provided under its self- insurance certificate with the Texas Department of Public Safety to self-insured independent contractor driver taxicab licensees. Accordingly, it is our position that pursuant to the U.S. Bankruptcy Code, this proceeding should be stayed.

Respectfully submitted,

**PAGEL, DAVIS & HILL, P.C.**

/s/ Martyn B. Hill

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**ATTORNEYS FOR DEFENDANTS**

**GREATER HOUSTON TRANSPORTATION**

**COMPANY AND YELLOW CAB**

**PARATRANSIT SERVICES, INC (including the  
merged entity, Texas Paratransit, Inc)**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 23<sup>rd</sup> day of July 2021, the foregoing was submitted for electronic filing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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